

EXHIBIT 1

In The Matter Of:

*Andrew Colborn v
Netflix, Inc., et al.*

*Brenda Schuler
May 20, 2022
Confidential*

*Colleen Reed Reporting LLC
P.O. Box 293
Milwaukee, Wisconsin 53201
www.colleenreed.com*

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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

ANDREW COLBORN,

Plaintiff, CIVIL ACTION NO. 19-CV-0484

-vs-

NETFLIX, INC., ET AL, ***CONFIDENTIAL***

Defendants.

DEPOSITION OF: BRENDA SCHULER

DATE: May 20, 2022

TIME: 8:39 a.m. to 4:57 p.m.

LOCATION: Godfrey & Kahn, S.C.
833 East Michigan Street
Suite 1800
Milwaukee, Wisconsin 53202

REPORTED BY: Janet D. Larsen, RPR

1 A P P E A R A N C E S

2

3 SCHOTT BUBLITZ & ENGEL S.C., by
4 APRIL ROCKSTEAD BARKER, ATTORNEY AT LAW
640 West Moreland Boulevard
5 Waukesha, Wisconsin 53188
abarker@sbe-law.com
6 appeared via Zoom videoconference on
behalf of the Plaintiff.

7 BALLARD SPAHR LLP, BY
8 LEITA WALKER, ATTORNEY AT LAW
2000 IDS Center
9 80 South 8th Street
Minneapolis, Minnesota 55402
walkerl@ballardspahr.com
10 appeared on behalf of Netflix, Inc.

11 BALLARD SPAHR LLP, BY
12 ISABELLA SALOMAO NASCIMENTO
ATTORNEY AT LAW
2000 IDS Center
13 80 South 8th Street
Minneapolis, Minnesota 55402
14 salomaonascimento@ballardspahr.com
15 appeared via Zoom videoconference on
behalf of Netflix, Inc.

16 BALLARD SPAHR LLP, by
17 EMILY S. PARSONS, ATTORNEY AT LAW
1909 K Street NW, Suite 1200
18 Washington, DC 20006-1157
parsonse@ballardspahr.com
19 appeared via Zoom videoconference on
behalf of Netflix, Inc.

20 JASSY VICK CAROLAN LLP, by
21 MEGHAN E. FENZEL, ATTORNEY AT LAW
KEVIN L. VICK, ATTORNEY AT LAW
22 355 South Grand Avenue, Suite 2450
Los Angeles, California 90071
mfenzel@jassyvick.com
23 kvick@jassyvick.com
24 appeared via Zoom videoconference on
behalf of Chrome Media LLC.

25

1 ANNIGIAN RYAN LLP, by
2 NICHOLAS A. KURTZ, ATTORNEY AT LAW
3 114 North Indian Hill Boulevard, Suite E
4 Claremont, California 91711
5 nk@arllp.com
6 appeared on behalf of the Witness.

7
8 ALSO PRESENT VIA ZOOM VIDEOCONFERENCE:
9 Moira Demos
10 Laura Ricciardi
11
12
13
14
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1 Do you see all that?

2 A. I do.

3 Q. Do you remember getting an email from Mr. Colborn
4 in reference to what he says here, about Judge
5 Pamela Pepper?

6 A. My recollection isn't great on it, but I believe
7 it was something regarding, like, her history on a
8 website or something. Did you get the email. I
9 don't remember exactly what it was.

10 Q. Are you willing to run a search for the name
11 Pamela Pepper and send us any email you have about
12 her?

13 A. Possibly.

14 Q. And Mr. Colborn says, I will forward what Mike
15 sent me about her.

16 Do you see that?

17 A. Yes, m-hm.

18 Q. And so he's forwarding you a communication that he
19 had with -- Mike Griesbach -- I'll withdraw that.

20 My first question is Mike is a reference
21 to Mike Griesbach; correct?

22 A. Yes.

23 MS. BARKER: Object as to foundation.

24 Q. So he was forwarding you a privileged
25 communication he had with his attorney,

1 Mr. Griesbach; correct?

2 MS. BARKER: Same objection.

3 A. I don't know, I don't know how privilege works.
4 I'm sorry. I don't know if he was just sharing
5 something he didn't care if it was privileged or
6 not or if all attorney-client is privileged for
7 anything. I don't know. But, yes, he forwarded
8 an email from Mike Griesbach.

9 Q. Okay. And he said, just between you and me, tho,
10 and what was your understanding of why he said
11 that?

12 MS. BARKER: Object as to foundation.

13 A. Not to share with anyone.

14 Q. Did he ever tell you to not tell Mr. Griesbach
15 that he was sharing communications with you?

16 A. Maybe, maybe. I don't, I can't think of anything
17 offhand but maybe. He could have said, don't
18 share this with Mike. I, I don't know.

19 (Exhibit [2028](#) marked for identification)

20 Q. The court reporter just handed you Exhibit [2028](#).
21 Again, these are text messages between you and
22 Mr. Colborn; correct?

23 A. Yes.

24 Q. And the exhibit begins at Bates No. 8990, but I'll
25 direct you to three pages in, 8992.

1 how much they support our decision to do this, and
2 the pastor told me we will all be in his prayers.
3 Thought you would like to know that, Brenda.

4 Did I read that correctly?

5 A. Yes.

6 Q. And you say, Aww. Thanks so much. That is
7 wonderful to hear. And he says, You betcha. Nice
8 to have the support of a church, and people seem
9 to be happy about what we are doing.

10 Did I read that correctly?

11 A. Yes.

12 Q. And so, like, he had the support of his law
13 enforcement community, Mr. Colborn had the support
14 of his church community; correct?

15 A. Yes, his church, yes.

16 Q. Oh, you can hang on to that actually --

17 A. Okay.

18 Q. -- for just one more minute.

19 I'll take that back. I'm going to hand
20 you another exhibit.

21 (Exhibit [2051](#) marked for identification)

22 Q. So the court reporter has handed you Exhibit [2051](#).
23 These are texts, and really they're, well, they're
24 texts with some photographs from Mr. Colborn to
25 you; correct?

1 A. Correct. Yes.

2 Q. And at the top on Bates No. 5126 he says, This is
3 what I have for you, and he sends you a picture of
4 a box with some files in it, it looks like; is
5 that correct?

6 A. Correct, yes.

7 Q. And this was coming in June of 2018; right?

8 A. Yes.

9 Q. And what was in that box?

10 A. That was the file that he had previously given to
11 a prior attorney that he gave to me. It was the
12 CDs that we were talking about earlier, the 27,
13 his personnel report. Oh, his personnel -- It was
14 everything pretty much from Manitowoc County
15 regarding his personnel report, complaints he had
16 received, or I don't want to say complaints,
17 emails he had received that we talked about
18 earlier. What else was in there. It was
19 everything related to him personally that he had
20 given to a prior attorney that he had hoped would
21 take his case.

22 Q. Do you know that attorney's name?

23 A. No, no.

24 Q. And he or she decided not to take Mr. Colborn's
25 case?

- 1 A. I don't know if, I don't know the situation,
2 honestly. I don't know what it was.
- 3 Q. He never talked to you about why that attorney
4 said no?
- 5 A. Maybe. I don't remember if he, what he said about
6 it. I just knew that she wasn't taking it,
7 whoever it was. Might have been a prior -- I
8 thought she worked for, he knew her through his
9 job somehow, I thought.
- 10 Q. Have you given us the documents in that box in the
11 picture?
- 12 A. That's the ones we talked about earlier with all
13 of the complaints and the personnel reports.
- 14 Q. So all the ten?
- 15 A. Yes, yes.
- 16 Q. It's a pretty small box. Does seeing it again
17 make you more willing to give us everything?
- 18 A. I think everything in it you're either going to
19 either have or it's the ten complaints because
20 this is what was given to his lawyers. I don't
21 have this box anymore, so it's, it's -- I did give
22 you the personnel report, I believe.
- 23 Q. So you don't have this box anymore?
- 24 A. No, no. Nor, nor this.
- 25 Q. Okay. But you think you gave us everything

1 that -- I mean did you make a copy of everything
2 that was in the box before you gave it to his
3 lawyers?

4 A. I scanned a lot of it, and I also had the wave
5 files of the CDs with the calls.

6 Q. Okay. And so you think you have given all of that
7 to us?

8 A. Everything that I copied or put on-line, yes.

9 Q. Okay. On the next page, there's another photo of
10 a file in, like, a plastic folder.

11 Do you see that?

12 A. Yes. Yes.

13 Q. And what was that?

14 A. I just want to see what this one is. Since
15 release of Making a Murderer -- Oh, okay. This
16 is, these are formal incident reports, the top one
17 anyway, incident reports that came in, whether it
18 be, like, the bomb threats that they received. He
19 had a couple interactions with people threatening
20 him. So there were more of the incident reports.
21 I know there was a lot of emails between one or
22 two parties that just went back and forth, back
23 and forth, and I believe there were several copies
24 of the same one that seemed like a big stack
25 because I remember kind of sorting it. The CD is

1 A. Right.

2 Q. Which phone call again? Say it again for me.

3 A. Sure. That '95, '96 phone call that Andy received
4 and transferred --

5 Q. Got it.

6 A. -- to a detective.

7 Q. Yeah.

8 A. Mike was under the impression, I believe, somehow,
9 some way that Kusche actually received a call, and
10 I caught that in the Complaint, and I said, I
11 don't think that's, I never heard that, where is
12 that from.

13 Q. Mike was under that impression because Kusche
14 might have told him that?

15 A. No. I don't know how Mike was under the
16 impression. I have no idea.

17 Q. Just a mistake?

18 A. Right.

19 Q. We'll move on.

20 I'm going to hand you two exhibits at
21 once. This will be [2063](#), this will be [2064](#).

22 (Exhibits [2063](#) and [2064](#) marked for
23 identification)

24 A. All right.

25 Q. If you could look at [2063](#) first. This is an email

1 Mr. Colborn sent to you on December 7th, 2018.

2 A. Yes.

3 Q. And it forwards an email he got from his attorney,
4 Mr. Griesbach; correct?

5 A. Correct.

6 Q. And it's a partial draft of the Complaint about a
7 week before it was filed; correct?

8 A. Correct.

9 Q. And this is, we've seen text messages between you
10 and Mr. Colborn about your edits, but this is the
11 email where he actually sent the thing to you;
12 correct?

13 A. That's what it looks like, yes.

14 Q. And then Exhibit [2064](#) is a similar email where
15 Mr. Griesbach had sent a second section of the
16 Complaint, draft Complaint, to Mr. Colborn, and
17 then Mr. Colborn sent it to you; correct?

18 A. Right. The second part, correct.

19 Q. Did you have any concerns as all this was
20 happening about Mr. Colborn preserving
21 attorney-client privilege?

22 A. No, because I wasn't aware of any of that. I mean
23 I even was working with Mike researching in the
24 book and I felt like things that a legal assistant
25 would almost do. So, no, I didn't even know that,

1 to be honest, that that would be an issue, and I
2 didn't even think about it since, because Mike did
3 know I was checking it. I, I didn't remember that
4 Andy sent it to me first.

5 Q. So at some point Mr. Griesbach found out. He
6 maybe didn't know on December 7th; correct?

7 A. Very soon after.

8 Q. Okay. Let's mark this as Exhibit [2065](#), and I'll
9 give you just a minute or two to, to review [2065](#).
10 And I'm going to be pointing you to -- Well, I'll
11 give you a chance to review it, but then I just
12 want to confirm that these are text messages
13 between you and Andy Colborn talking about edits
14 to the Complaint.

15 (Exhibit [2065](#) marked for identification)

16 A. All right. Let me take a look here. How far did
17 you want me to read? I'm sorry.

18 Q. Well, let me ask you this. This was all sent on
19 December 16th, 2018; correct, December 16th, 2018?

20 A. Correct.

21 Q. And this is just a couple days before the
22 Complaint was to be filed; correct?

23 A. I believe one day, actually, one, one or two,
24 yes.

25 Q. And you're in this text message chain going back

1 between you and Mr. Colborn; correct?

2 A. Yes.

3 Q. And I'll direct you to page Bates No. 7072.

4 A. Okay.

5 Q. We don't have to read this. This is a big, long

6 text.

7 A. I know. Who is this? Him to me? Me to him.

8 Q. You to Mr. Colborn. Let me read the first couple

9 lines.

10 A. Okay.

11 Q. And just to set the stage, this is January 6,

12 2019, right after the Complaint was filed;

13 correct?

14 A. Correct.

15 Q. So you say, Mike is on the other line with him

16 now. He called while I was chatting with him.

17 I'm glad he did because of the attorney work

18 product, and I'm not, quote, officially working,

19 quote, for Mike. I'll have to ask him how we get

20 my stuff to be privileged. Anyway, period. And

21 then you go on to talk about this character named

22 Rocky Lapomarto. But my question is, it seems

23 maybe to have occurred to you at this point there

24 are some privilege and attorney work product

25 issues?

1 A. Yes.

2 Q. And you were expressing, I don't know if it's
3 concern or maybe curiosity about that?

4 A. Right after -- Yes, yes, that's what it appears
5 definitely.

6 Q. And did you ever ask Mike, quote, how we get my
7 stuff to be privileged, as you say there in the
8 text message?

9 A. My recollection, I don't know if this, when this
10 was, but, yes, I remember sharing information,
11 again, up until April and the group took over,
12 just saying how I don't want my things to be
13 public, okay. I wasn't, I don't think I
14 necessarily, necessarily was thinking anything
15 about his stuff not being privileged by including
16 me. I was more worried about my stuff becoming
17 public that I was sharing with him.

18 Q. Okay. And did you ever get an answer from
19 Mr. Griesbach about that?

20 A. If I recall correctly, I believe he said, just put
21 attorney-client privilege on it or something
22 because I was not officially in a paid capacity
23 working for him, more of a -- I don't know what I
24 was.

25 Q. A volunteer?

1 A. I wasn't officially working for him, but I was
2 certainly helping him.

3 Q. Got it.

4 MS. WALKER: Let's mark this as [2069](#).

5 (Exhibit [2069](#) marked for identification)

6 Q. [2069](#) is another text exchange between you and
7 Mr. Colborn; correct?

8 A. Yes, m-hm.

9 Q. And this is now a couple months after the lawsuit
10 was filed in February 8th of 2019.

11 Do you see that?

12 A. February, yes, I do.

13 Q. And you say to Mr. Colborn, Hey, are you around?
14 He says, Yeah, I'm at home. What's up? And you
15 say, Oh, no biggy. Mike left me a message about
16 the meeting and sounds like I can't help at all.

17 Do you see that?

18 A. Yes.

19 Q. And you say, I don't want to be deposed, but I
20 said if they wanted me to sign something that I
21 can help with no pay, I'd be happy to. But they
22 don't think it's a good idea. It's all good. Was
23 just going to fill you in if Mike hadn't yet.

24 Do you see that?

25 A. Yes.

1 Q. And tell me about the message he left or the
2 conversation you had about why you were no longer
3 able to help with the case.

4 A. Sure. As you can probably tell, prior to the
5 Complaint being filed, I was a big part of helping
6 the research aspect of it, so I think that was
7 always kind of the plan. I wasn't doing much with
8 transition at that point, if, hardly anything. So
9 when April and the group came on and took it on,
10 they obviously have their own resources. I wasn't
11 an employee of Mike's. Officially I couldn't
12 really bring any value to them. I had hoped I
13 could because I wanted to be part of that. And
14 it, it just wasn't, I wasn't able to do that. And
15 for obvious reasons, they have their own staff.
16 I'm not an attorney, so he was just letting me
17 know that I really couldn't know anything, be a
18 part of anything, see anything, so it was kind of
19 I think where the big cutoff was where we, I
20 handed it off and had to step back quite a bit.

21 Q. Mr. Colborn seems fairly disappointed by that. He
22 says in the next text message, Mike hadn't
23 mentioned that. I was really hoping you could be
24 involved, although I certainly see why they
25 wouldn't want to be deposed. Can you still give

1 info to Debra and will you still be willing to?

2 Do you see that?

3 A. I do, yes.

4 Q. And, in fact, what happened is that Mr. Colborn
5 did continue to keep you in the loop on this
6 lawsuit off and on; correct?

7 MS. BARKER: Object. Foundation.

8 A. I think -- Not to the same degree had I stayed on
9 with him, obviously. But, yeah, I mean he, he
10 told me periodic things so, sure, sure, more as a
11 friend than a resource person.

12 Q. The info he references giving to Debra --

13 A. Yes.

14 Q. -- what was that, and did you give it to her?

15 A. I did, and I, I did include those in discovery. I
16 was handing off all of my research documents that
17 I felt would be applicable in the Complaint that I
18 had used to check the Complaint, so I was
19 basically just getting her up to speed on the
20 background of the case, their investigator.

21 Q. Did you have a conversation with her --

22 A. I did, yes.

23 Q. -- to orient --

24 A. I met with her.

25 Q. You did.

1 A. Yes.

2 Q. Okay. Did you ever draft any exhibit to any
3 Complaint like a comparison, a list of defamatory
4 statements or a comparison of trial testimony to
5 what was in Making a Murderer?

6 A. In the first Complaint, yes, I did. The second
7 Complaint, unless they used something from the
8 first Complaint, I had nothing to do with the
9 second when, again, I don't know what you call it,
10 the Amended Complaint, when April and George came
11 on. The first one, yes. The first one, yes, I
12 know I had an exhibit in there.

13 MS. WALKER: Mark this as Exhibit [2070](#).

14 (Exhibit [2070](#) marked for identification)

15 Q. So this is an email string with a lot of signature
16 block.

17 A. Right.

18 Q. Stuff we can ignore at the end, but if you flip
19 backwards from that, the first real email at the
20 bottom of the chain is from Deb Bursik to you
21 asking if there's a piece of paper regarding the
22 dispatch call Mr. Colborn received.

23 Do you see that on January 16th, 2019?

24 A. What page are you on?

25 Q. I'm on the 2829.

1 A. Right. Right.

2 Q. All right.

3 A. And it was on-line, which -- Okay. I just got it
4 maybe before it became public, I guess, right.

5 (Exhibit [2081](#) marked for identification)

6 Q. So now you're looking at a text exchange marked
7 [2081](#). Correct?

8 A. Yes.

9 Q. And this is about a mediation that occurred in the
10 case. Do you see that in the top email, top text?

11 A. Right, m-hm. Yes.

12 Q. And Mr. Colborn proceeds to tell you about what
13 happened at the mediation. He says, Netflix and
14 the twins refuse to settle so now the case is back
15 in front of the judge.

16 Do you see that?

17 A. Yes.

18 Q. And then a sentence or two later he says, The
19 twins, and is this a reference to Ricciardi and
20 Demos?

21 A. Yes.

22 Q. The twins feel that they were very fair and honest
23 with their documentary and are appalled at my
24 frivolous suit, which is trying to tarnish their
25 sterling reputation. Netflix says all they did

1 was distribute it, not our fault.

2 Did I read that correctly?

3 A. Yes.

4 Q. And so you understood that Mr. Colborn was telling
5 you what happened at the mediation; correct?

6 MR. KURTZ: Objection. Document speaks
7 for itself.

8 MS. BAKER: Foundation.

9 A. Yes.

10 MS. WALKER: Did you get the answer?

11 (Answer read)

12 Q. Did you have any idea that Mr. Colborn should not
13 be sharing with you what happened at a
14 confidential mediation?

15 MR. KURTZ: Objection. Calls for a
16 legal, speculation and conclusion.

17 MS. BARKER: Join.

18 A. I, I don't know. I think I just looked at it like
19 it was a friend sharing information that he
20 trusted. I don't know, because I still thought
21 this one, I don't know, I don't know, which ones
22 were public or became recorded, and I felt like he
23 did give me information maybe before it became
24 public, but it still became public, but this maybe
25 wasn't. I don't, I don't remember.

1 Q. So if you go to the next page --

2 A. Sure.

3 Q. -- there's another text from Mr. Colborn. He
4 says, They, I think he means the filmmakers, were
5 there! I told you what they said in the text I
6 sent this morning! And what Netflix said.
7 Absolutely no effort to mediate at all.

8 Did I read that correctly?

9 A. Yes.

10 Q. And you said, I thought maybe it was just their
11 lawyers talking. Damn, we should have been
12 filming that. Or at least she'll know I'm walking
13 out.

14 Did I read that correctly?

15 A. You did, but I don't think that's what I meant to
16 type. I don't know what that means.

17 Q. Yeah. But it sounds like you wished you could
18 have been at the mediation to film the defendants
19 in this case; is that right?

20 A. Yes.

21 Q. And why did you want to film them?

22 A. I just wanted to be there probably more than
23 anything. I said that from the beginning, I'd
24 love to be able to be part of that.

25 Q. And on the next page, 9139 --

1 A. Okay.

2 Q. -- a couple texts down, you say, We could have
3 filmed them walking out of the building.

4 Do you see that?

5 A. Yes.

6 Q. Out of the hearing, I mean; correct?

7 A. Yes.

8 Q. And then in the next text from Colborn, he
9 clarifies that it was done by Zoom.

10 Do you see that?

11 A. Yes.

12 Q. And that, quote, They are all, they are playing
13 COVID to the hilt.

14 Do you see that?

15 A. Yes.

16 Q. Did you encourage Mr. Colborn to file this
17 lawsuit?

18 MR. KURTZ: Objection. Vague.

19 MS. BARKER: I'm sorry, I didn't hear
20 that question. Could you read it back.

21 (Question read)

22 A. I encouraged him, told him I would support him
23 regardless, whether he did or not. He wasn't sure
24 if he wanted to. It took him a long time to make
25 that decision until he had to. I told him I would

1 help him any way possible. If I, if I could
2 provide information that would help his case,
3 yes.

4 Q. Did you ever talk to Shawn Rech about
5 Mr. Colborn's decision to file a lawsuit?

6 A. Yes, I believe I did, yes.

7 Q. Okay. Was Shawn Rech supportive?

8 A. I remember two situations, and they vary. So I
9 don't know what time frame they were, but one was
10 once he -- I don't think he wanted him to simply
11 because he had experience with that, okay. So
12 that was one time I remember that he knew how, how
13 lawsuits worked and that he knew what would happen
14 going through everything. On the other hand, Andy
15 was, really wanted to do that, so I remember a
16 conversation about potentially one of Shawn's
17 partners, not partners, not acquaintances, what is
18 he, I don't know, friends that was an attorney
19 that he worked with on prior projects, that he
20 asked him to, he put him in touch with him, and
21 nothing became of it because he's not that type of
22 lawyer is my understanding.

23 Q. Did you ever talk to Mr. Rech about how
24 Mr. Colborn's lawsuit might impact Convicting a
25 Murderer?

- 1 A. I'm sure it was a discussion that we would have to
2 include it to some degree, but we weren't able to
3 film any of it anyway, so it didn't matter. Once
4 he got the lawyers, it became kind of a completely
5 moot point. Would I have loved to follow through
6 this whole process and filmed it, yes, because of
7 how I felt about everything. I think Shawn was
8 probably smarter knowing that that would never be
9 the case.
- 10 Q. Do you know if Mr. Rech felt like the lawsuit in
11 any way has stolen the thunder of Convicting a
12 Murderer and that it'll be old news in some sense
13 by the time it's released?
- 14 A. I don't know that the lawsuit would have affected
15 that he felt our film would be any less valuable.
- 16 Q. I'm just asking; I don't know.
- 17 A. Yeah, okay, okay. As far as old news, I mean the
18 longer you get from anything, sure, I mean things
19 take time. Do we wish we could have gotten it out
20 two years ago, absolutely.
- 21 Q. Do you think this lawsuit is keeping it relevant
22 so that people will still be paying attention to
23 Convicting a Murderer when it's released?
- 24 A. I don't think very many people are paying
25 attention to this lawsuit so, no.

1 Q. Are you concerned that because of Convicting a
2 Murderer, Mr. Colborn hasn't been able to speak
3 out in his defense?

4 A. Am I concerned?

5 Q. That he's had to keep his lips sealed and wait for
6 Convicting a Murderer to be released?

7 MR. KURTZ: Objection. Argumentative.
8 Ambiguous.

9 A. I think he's not speaking --

10 MS. BARKER: Object.

11 A. -- because he has a lawsuit pending and he's not
12 able to. I don't think it had -- No, I -- No.

13 Q. But pre-lawsuit it was the Non-Disclosure
14 Agreements that kept him from speaking out;
15 correct?

16 MS. BARKER: Object as to foundation.

17 Q. Pre the lawsuit?

18 A. I didn't want him to get attacked publicly. I
19 thought it was futile for him to do any speaking
20 engagements. He wanted to do people calling in,
21 and I just thought that was a really bad idea. I
22 had witnessed that before. That was a big part of
23 it. I was concerned for him.

24 Q. And the agreements he voluntarily signed were also
25 a part of it; correct?

1 MS. BARKER: Object as to foundation.

2 A. Right, right. He wasn't able to. I mean he spoke
3 that clearly we would want something to be
4 exclusive in a film. So, yeah, I think that was
5 part of it.

6 MS. WALKER: So let's go off the record
7 for five minutes. I think that's all my
8 questions, but I want to double check.

9 MS. BARKER: Well, I'll have some.

10 (Break taken)

11 MS. WALKER: Ms. Schuler, I have no
12 further questions. Thank you for being a trooper
13 and for hanging with us today. The other
14 attorneys may have some questions.

15 THE WITNESS: Thank you.

16 E X A M I N A T I O N

17 BY MS. BARKER:

18 Q. Ms. Schuler, this is April Barker. I have some
19 questions.

20 A. Okay.

21 Q. You said that you watched all of the Making a
22 Murderer episodes several times; correct?

23 A. Correct.

24 Q. Making a Murderer included statements by
25 Attorneys Buting and Strang that were not from the

1 ERRATA SHEET

2

3 Deponent: Brenda Schuler

4 Date: 5-20-22

5 Case: Andrew Colborn v Netflix, Inc., et al

6

7 Page 14 Line 11-12 Change part. to contract Reason clarification8 Page 39 Line 26 Change 2013 to 2014 Reason clarification9 Page 40 Line 5 Change 2019 to 2020 Reason my error10 Page 47 Line 22-23 Change Jan to March Reason my error11 Page 48 Line 15 Change Mike to Lenk Reason Reporter error12 Page 49 Line 20 Change Within a month to several months Reason my error13 Page 80 Line 1 Change lamb blasted to lambasted Reason Reporter error14 Page 43 Line 12 Change 2005 to 2007 Reason Attorney error15 Page 48 Line 14 Change About him to Reason my error16 Page 287 Line 1 Change By Perak Don't to do Reason my error17 Page 168 Line 17-18 Change See below Reason context

18 Page ___ Line ___ Change ___ Reason ___

19 Page ___ Line ___ Change ___ Reason ___

20 Page ___ Line ___ Change ___ Reason ___

21 Page ___ Line ___ Change ___ Reason ___

22 Page ___ Line ___ Change ___ Reason ___

23 Page ___ Line ___ Change ___ Reason ___

24 Page ___ Line ___ Change ___ Reason ___

25 Page ___ Line ___ Change ___ Reason ___

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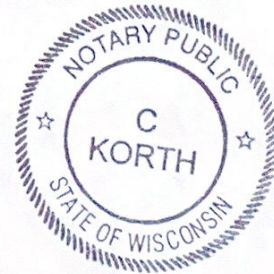
In regard to 17 above, the question by Ms Walker was taken out of context. She did not reference that my text, "we should shoot all liberal law professors" was in response to an attached article titled something to the effect of "UC Professor thinks all cops should be killed."

SIGNATURE PAGE

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5
6 I, Brenda Schuler, do hereby certify that I have read
7 the foregoing transcript of proceedings, taken the 20th
8 day of May, 2022, and the same is true and correct,
9 except for the list of corrections, if any, noted on
10 the errata sheet.

11
12
13 Dated this 24th day of June, 2022
14 Deponent Signature Brenda Schuler
15
16
17

18 Subscribed and sworn to before me this 24 day of
19 JUNE, 2022 in OUTAGAMIE County
20 State of WISCONSIN
21 My commission expires: 12-4-23
22 Notary Public Printed Name: CKORTH
23 Notary Public Signature CKORTH
24
25



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1 STATE OF WISCONSIN)

2 MILWAUKEE COUNTY)

3 I, JANET D. LARSEN, a Notary Public in
4 and for the State of Wisconsin, do hereby certify that
5 the deposition of BRENDA SCHULER was taken before me
6 under and pursuant to the Federal Rules of Civil
7 Procedure on the 20th day of May, 2022.

8 That before said witness testified,
9 she was first duly sworn by me to testify the truth.

10 That I am not a relative or employee or
11 attorney or counsel of any of the parties, or a
12 relative or employee of such attorney or counsel, or
13 financially interested directly or indirectly in this
14 action.

15 That the foregoing pages are a true and
16 correct transcription of my original shorthand notes
17 taken at said time and place.

18

19 Dated this 24th day of May, 2022
20 at Milwaukee, Wisconsin.

21

22 JANET DONALDSON LARSEN
23 REGISTERED PROFESSIONAL REPORTER
24 NOTARY PUBLIC, STATE OF WISCONSIN
25 MY COMMISSION EXPIRES 1-22-26

24

25

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